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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re:	:	Chapter 11
	:	
Veneer Products Ltd.,	:	Case No.: 17-22759 (RDD)
	:	
Debtor.	:	
	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
Rimi Woodcraft Corp.,	:	Case No.: 17-20002 (RDD)
	:	
Debtor.	:	
	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
Rimi Corporate Facilities Refurbishing Ltd.,	:	Case No.: 17-20001 (RDD)
	:	
Debtor.	:	
	:	
-----	X	

**APPLICATION PURSUANT TO SECTION 363(b)(1) OF
THE BANKRUPTCY CODE, RULES 2014 AND 6004(a) OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE
FOR AUTHORIZATION TO SELL ASSETS OF THE DEBTORS**

Veneer Products Ltd. ("Veneer"), Rimi Woodcraft Corp. ("Rimi Woodcraft"), and Rimi Corporate Facilities Refurbishing Ltd. ("Rimi Corporate"), as Debtors and Debtors-in-possession (collectively, the "Debtors"), hereby move this Court for entry of an order pursuant to Section 363(b)(1) of Title 11 of the United States Code (the "Bankruptcy Code"), Rules 2014(a) and 6004(a) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") authorizing the Debtors to sell certain assets of the Debtors, as listed on the Equipment List annexed hereto as **Exhibit A** at auction by Ex-Factory Inc. doing business as Ex-Factory Auctions (collectively, the "Auctioneer"), respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory bases for the relief sought herein are Sections 363(b)(1) of the Bankruptcy Code and Bankruptcy Rules 2014(a) and 6004(a).

BACKGROUND

3. On May 23, 2017 (the "Petition Date"), the Debtor commenced Voluntary Cases (the "Chapter 11 Cases") under Chapter 11 of the Bankruptcy Code with the United States District Court for the Southern District of New York (the "Court"). Pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code, the Debtors are continuing to manage their affairs as Debtors in Possession.

4. The United States Trustee for the Southern District of New York was not able to appoint a statutory committee of unsecured creditors, pursuant to Section 1102 of the Bankruptcy Code (the "Committee").

5. Information regarding the Debtors' history and business operations, capital structure and secured indebtedness, and the events leading up to the commencement of the Chapter 11 Case is set forth in the Declaration of Anthony Rizzo in Support of the Debtors' Chapter 11 Petition [Docket No. 5 filed in the Veneer Case], which were filed on the Petition Date.

6. The Debtors own assets that must be liquidated because the Debtors are winding down their operations. The Debtors' remaining assets include the equipment (collectively, the "Equipment"), a schedule of which is annexed hereto as the Equipment List (**Exhibit A**) and owned vehicles (the Vehicles), that were used in the Debtors' operations. The Vehicles will be sold separately.

7. The Debtors believe, in the exercise of its sound business judgment, that the best mechanism to maximize the value of the Equipment is to conduct a public auction (the "Auction").

8. Thus, the Debtors seek authority to (a) conduct the Auction, and (b) sell the Equipment to the successful bidder(s) free and clear of all liens, claims and encumbrances, with all liens, claims and encumbrances to attach to the proceeds. All proceeds to be held in escrow by Rattet PLLC pending further order of the Court.

9. All proceeds of the sale shall be placed in escrow by Rattet PLLC pending further court order.

10. This matter is of utmost importance for the reason that the Debtors have terminated business operations and under an agreement with the Debtors' landlord to be separately submitted must surrender their business premises at 1185 Commerce Drive, Bronx, New York no later than September 30, 2017.

11. Furthermore the Debtors are accruing continuing liability for utilities and insurance and thus must sell the Equipment in order to vacate the Premises. The Equipment is not readily portable and thus must be sold on site.

12. The Debtors are advised the sale process, including an online auction and time for purchasers to remove the purchased Equipment will take approximately six to eight weeks. Thus, in order to complete the process the Debtors require immediate relief.

13. In connection therewith the Debtors have solicited the consent of all lienholders, including the Internal Revenue Service, the holder of a UCC lien, MVRC, Inc. and the Office of the U.S. Trustee.

RELIEF REQUESTED

14. By this Application, the Debtors seek authority to sell the Equipment (Exhibit "A"). The proceeds will be turned over to Debtors' counsel to be held in a segregated account within ten (10) business days of the conclusion of the auction sale.

15. In view of the urgency of the situation the Debtors request that the Court dispense with notice.

BASIS FOR RELIEF

16. Section 363(b)(1) of the Bankruptcy Code authorizes a Debtor in Possession, with the Court's approval, to sell assets out of the ordinary course of business with leave of Court.

17. Here, it is necessary that the Debtors liquidate the assets immediately.

NOTICE

18. As set forth above, the Internal Revenue Service, the private lienholder MVRC, Inc. and the Office of the U.S. Trustee have consented to the sale.

19. Thus, the Debtors respectfully request that the Court dispense with further notice.

WHEREFORE, the Debtors respectfully request that the Court enter an order authorizing the action sale, together with such other and further relief as the Court deems just and proper.

Dated: White Plains, New York
July ___, 2017

RATTET PLLC
Attorneys for Debtors

By: _____
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EXHIBIT A

EQUIPMENT LIST

RIMI WOODCRAFT CORP.
1185 COMMERCE AVE.
BRONX NY 104162
ATT: Anthony Rizzo

July 11, 2017

- 1) Central 16 speed drill press
- 2) Qty of 2, Powermatic 20" drill press
- 3) Rockwell 10" unisaw
- 4) Delta dust collector, 1 upper , 1 lower bag
- 5) Ingersoll Rand vertical air compressor
- 6) Horizontal bandsaw
- 7) Portable Sawstop tablesaw
- 8) Joos hot press 4' X 10', 6 cylinders
- 9) 20" Delta wood cutting bandsaw
- 10) Qty of 4, Cantilever heavy duty racking
- 11) Bench type metal chop saw
- 12) Vacuum form machine
- 13) TCM 6000 LB. propane operated forklift, model : FCG30 side shift, solid tires, safety equipment
4000 hours approx.
- 14) (Older) TCM 6000 LB. propane operated forklift, model : FCG30 side shift, solid tires, safety
equipment
- 15) Hess vertical Case clamp , 6 pneumatic side pressure rollers, S/N# MB961788/109
- 16) Weeke model : OPTIMAT BP150, Point to Point machine, year: 1998, S/N# 0-250-13-0120
- 17) Double end pedestal buffer
- 18) Bauerle cut off saw
- 19) Mattison model: 404, Rip saw (chain in good condition)
- 20) Delta cyclone dust collection system
- 21) 6" Non oscillating edge sander
- 22) Foley tool grinder
- 23) Qty of 2, Wright fork lift dumper / hopper
- 24) Delta 20" floor model drill press
- 25) Delta unisaw with Biesemeyer fence system
- 26) Delta dust collector
- 27) Paint mixers, spray pots
- 28) Paint spray booth, 12' left to right, 15' deep, 10' height, 4 explosion proof lights, micro trap
filter, vertical exhaust
- 29) Paint spray booth, 12' left to right, 15' deep, 10' height, 4 explosion proof lights, micro trap
filter, vertical exhaust

- 30) Altendorf sliding table panel saw, model: F45, mach# 332-4403-4, year: 1984, cross cut fence, rip fence, blade guard, no scoring
- 31) Holz NRA vertical bandsaw, model: 600, S/N# 20717, on factory dolly
- 32) Altendorf sliding table panel saw, model: F45 / slider 3200, type: 736363RM009, S/N# 98-02-549, year: 1998, with two fences, blade guard, and scoring
- 33) Delta 17" floor model drill press
- 34) Altendorf sliding table panel saw, model: F45, type: 3539071/31, S/N# 91-3-314, year: 1991, with fences digital readout, guard, scoring
- 35) Altendorf sliding table panel saw, model: F45, type: 3436926/05, S/N# 88-4-11, year: 1988, 12' carriage, with fences, scoring, guard,
- 36) Festo 3 roll powerfeed
- 37) Altendorf sliding table panel saw, model F45, type: N112MGB, S/N# 93-7-88, year: 1993, 12' carriage, with fences, guard, digital readout, scoring
- 38) Marbel Laminate splitter, model: LS1, S/N# 4169,
- 39) Grizzly tilting vertical spindle shaper, model: G72152, S/N# 204940, year: 2003, with 4 roll powerfeed
- 40) Formmia horizontal boring machine
- 41) Festo 3 roll powerfeed
- 42) Festo 4 roll powerfeed
- 43) Hessman 10' semi-automatic stroke sander (10 X 950), double belt, S/N# 8250
- 44) Jet wood turning lathe
- 45) Holz Her edgebander, model: Genesis 1435 SE, coil strip feed, cartridge flue unit, 3 side pressure, front/ back trim, top / bottom trim, top /bottom scrap, top / bottom sanding
- 46) Martin T25 tilting spindle vertical shaper, S/N# V157258, year: 1988, with guards and fence
- 47) Like new, Maggi 4 roll powerfeed model: 2044 STEFF,
- 48) 14" wood cutting bandsaw
- 49) 16" Steton jointer, model: F400, mach# VGR 271, tilt infeed table, guard, fence
- 50) Weing knife grinder model: R931, S/N# 931/839, year: 1987
- 51) Weing 9" four head feed thru moulder, model: 922, S/N# 226-1461, year: 1986, with control panel, variable speed
- 52) Okoma 24" planer, type: DM63, year: 1981, power table
- 53) Holzma front load panel saw, model: OPTIMAT HPP82, type: OPT-HPP-82/38, S/N# 0-240-15-2101, year: 2001, with 3 air tables, 7 grippers,
- 54) Butfering 3 head 52" wide belt saner, model: OPTIMAT SCO 313/ QCE, Diamond QCE, S/N# 0411490512, year: 2004?
- 55) Hofer 8 cylinder hot press, model: HKP-400, S/N# 2518488, year: 1985 (confirm size 12'X 5' or 12' X 6')
- 56) Osama 52" top and bottom glue spreader, model: S4R/P-1600, S/N# 4581, year: 2008,
- 57) Kuper stitcher. Model: F61-1250, S/N# 4205/3086, year: 2002
- 58) Josting (confirm size 14' or 12') guillotine, mach# EFS-3600, S/N# 9737, year: 1985
- 59) Moldow roof top dust system
- 60) Sullair Built is air compressor with Airtex dryer

- 61) Grizzly dust collector, model G8027, S/N# 22328, year: 2005
- 62) Qty of 3 paint storage cabinets
- 63) Qty of 20 tool storage gang boxes
- 64) Qty of 12 wood work benches
- 65) Misc: spray pots, shipping blankets, fans, bar clamps, extension cords, bar clamps, (10) air filter regulators, pallet racking, fire extinguishers, pipe clamps, (15) rolling material carts, hand trucks, scale, dock plate, dollies, ladders, lockers, drying racks, saw blades, cutters, pints, eyewash station, tool bins, first aid kit, sand paper, roller stands
- 66) Misc: Dayton grinder, Makita drill sets, Dewalt chop saw, portable jig saw, chop saw, grinders,
- 67) Raw material: drywall, lumber, veneers, mouldings
- 68) **Complete storage room of hardware**
- 69) **Contents of offices**